

RECEIVED
OFFICE OF
CHILDREN'S ISSUES

DEC 2 9 54

U.S. Department of State
BUREAU OF
CA/OSC/PRI AFFAIRS

Adoption Regulations Docket
2201 C St. NW Room SA-29
Washington, DC 20520

2111 Raybrook SE. # 3008
Grand Rapids, MI 49546
12/5/03

Re: Inter-country Adoption Act
Docket number, State/AR-01196

Dear Dept of State staff,

Thanks for giving an opportunity to comment on the proposed regulations for the Inter-country Adoption Act. My comments involve primarily one issue.

The law and regulations provide for an organization, or entity, in each country to develop and enforce standards for organizations providing inter-country adoptions. However they do not appear to recognize that child placing agencies are licensed in every State. The licensing rules (state regulations) are state-specific, but also have many commonalities. Therefore the entire operation could be made much simpler and less costly if a prerequisite for applying for inter-country adoption approval were evidence that the organization is licensed by the state(s) in which it proposes to provide inter-country adoptions.

There are a number of reasons for this:

1. the basic protections for children and their families, as well as program quality issues, already are in place in each State, through licensing. To add additional standards in these same areas would be costly to develop and, much more, to implement.
2. having more than one set of regulations or standards for the same areas could be confusing for service providers. In fact if they were in conflict with each other, the agencies would experience Catch 22 impasses.
3. occasionally persons, or organizations, wishing to provide adoption services are of questionable legal standing, and they almost invariably are of poor quality. State licensing would screen these out.
4. with requiring State licensure as a prerequisite, the State Dept. could concentrate on activities that would be necessary for inter-

country adoption procedures and practices, and probably do a much better job by specializing on that rather than trying to cover everything. It would be advisable, however, that each agency be required to submit a copy of the most recent licensing study report. (each one) If that report raised questions about the operation, that could be dealt with by the State Department staff in the approval, or re-approval, process.

While no operation is fool-proof, State licensing can be relied on to determine whether an agency is capable of providing the kind of services that you would hope to expect. It already exists in every State and there is no reason for two entities to try to assess and enforce the same things. With this arrangement the two entities in each State could work in harmony as an effective team.

I have been involved with State licensing for many years, first in Michigan in various roles, including the last several as director of the State child welfare licensing division. Following that I was the licensing specialist for the U.S. Children's Bureau for 20 years and worked with licensing staff of every State to strengthen and improve their services.

Sincerely,

A handwritten signature in cursive script that reads "Jake Terpstra".

Jake Terpstra
Child Welfare Services Specialist